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November 6, 2020

**BY EMAIL AND FEDEX**

Colin V. Ram  
McLeod Law Group LLC  
3 Morris Street, Suite A  
Charleston, SC 29403

**RE: *Bowen v. adidas America, Inc.*, Civil Action No. 3:18-CV-03118-JFA –  
adidas's Supplemental Production of Documents In Response to Plaintiff's First  
Set of Requests for Production**

Dear Mr. Ram:

On behalf of adidas America, Inc., today we have transmitted a supplemental production of documents, labeled ADID000000001-ADID000376580 and adidas000000089-adidas000000512, in response to Plaintiff's First Set of Requests for Production to Adidas America, Inc. dated July 13, 2020 (the "Requests"). These documents have been sent in part on an encrypted hard drive via FedEx, and in part via email. This production is made subject to and without waiving adidas's general and specific objections as stated in adidas's Responses to Plaintiff Brian Bowen II's First Requests for Production of Documents dated August 12, 2020.

In today's production, adidas has re-produced its prior productions from September 18, September 21, and October 9, 2020, with updated confidentiality designations, pursuant to the Court's Confidentiality Order dated September 25, 2020. adidas has also produced additional documents that were not included in prior productions that are responsive to Plaintiff's Request Nos. 3, 4, 7, and 8. The settlement agreement resolving the case *Skechers USA, Inc. v. Adidas America, Inc.*, No. 2:18-cv-03882 (C.D. Cal.) is not being produced because it is not relevant to this dispute.

Our effort to respond to Plaintiff's other Requests is ongoing. We will provide additional supplemental productions on a rolling basis until our response is complete.

Please contact me at (212) 909-6886 if you have any questions or if you have any trouble accessing the documents.

Sincerely,

/s/ Matthew D. Forbes

Matthew D. Forbes